

USDA - National Organic Standards

Docket #TMD-94-00-2

AgStop 0275

P.O. Box 96456

Washington, DC 20090-6456

Please accept the following comments on the proposed National Organic Standards and enter them into the official record.

I strongly believe that the proposed rule is not compatible or consistent with current organic practices!

I hereby respectfully request that you withdraw the proposed rules and resubmit a new draft rule based on the recommendations of the organic community - the National Organic Standards Board (NOSB).

Organic farming, trade and consumer groups have identified as many as 90 points where the proposed rules or USDA request for comments deviates from the high standards that reputable certifying agencies and states have established. The following is a sample of some of the points that I also object to:

- The use of Genetically Engineered Organisms, irradiation, or sewage sludge is unacceptable.
- The NOSB must be allowed to make all rulings on what is and is not "organic", not the USDA staff.
- Allowing 20% non-organic feed for livestock animals on a daily basis is unacceptable.
- Intensive confinement of livestock animals is inhumane and unacceptable to organic principles.
- Antibiotics use should be strictly restricted and not allowed as a substitute for preventive care.
- Proposed rules would allow cannibalism of livestock animals for feed protein.
- Repeatedly with tricky and illegal definitions the NOPPR would allow synthetics chemicals.
- Fees and costs for certification will increase excessively and be a burden to family farms.
- Organic farmers and certifiers will be expected to foot the bill for the new layer of USDA bureaucracy. Some small farmers will be forced out of business. The price for organic food will rise.
- The Proposed rules are not acceptable to foreign markets and will prohibit American farmers from marketing organics overseas.

(Additional comments below, and/or on attached sheet)

This is just a sample of my objections. Please review comments from the Coulee Region Organic Produce Pool (CROPP / Organic Valley), The Organic Crop Improvement Association (OCIA), the Organic Trade Association (OTA), the Organic Farmers Marketing Assoc., (OFMA), Nation Campaign for Sustainable Agriculture. I support the their additional objections

Sincerely,

Name/Business: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Consumer/Farmer/Retailer/Other? \_\_\_\_\_